

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN,

Plaintiff,

v.

TRACY DEEBBS-ELKENANEY P/K/A

TRACY WOLFF, et al.,

Defendants.

Case No.: 1:22-cv-02435-LLS-SN

**DECLARATION OF CECE M. COLE**

CeCe M. Cole declares as follows:

1. I am an associate with Cowan, DeBaets, Abrahams, & Sheppard LLP, attorneys for defendants Tracy Deebbs-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a MacMillan, and Universal City Studios LLC (collectively, the “Entangled Defendants”), in the above-captioned matter. I make this declaration in opposition to Plaintiff Lynne Freeman’s February 22, 2023 letter motion (ECF No. 131).

2. Attached hereto as Exhibit A is a true and correct copy of a document produced during discovery by defendant Tracy Deebbs-Elkenaney p/k/a Tracy Wolff (“Wolff”) bearing Bates Stamp Wolff\_0102203.

3. Attached hereto as Exhibit B is a true and correct copy of a document produced during discovery by Wolff bearing Bates Stamps Wolff\_0102250-Wolff\_0102699.

4. Attached hereto as Exhibit C is a true and correct copy of a document produced during discovery by Wolff bearing Bates Stamps Wolff\_0102700.

5. Attached hereto as Exhibit D is a true and correct copy of a document produced during discovery by Wolff bearing Bates Stamps Wolff\_0102701-Wolff\_0102939.

6. Attached hereto as Exhibit E is a true and correct copy of a June 30, 2010 email between Wolff and Stacy Cantor (Abrams) and its attachment.

7. Attached hereto as Exhibit F is a true and correct copy of an email chain dated October 19, 2010 through November 2, 2010 between Wolff and Stacy Cantor Abrams.

8. Attached hereto as Exhibit G is a true and correct copy of a document produced during discovery by defendant Emily Sylvan Kim bearing Bates Stamps KIM00352651-KIM00352655.

9. Attached hereto as Exhibit H is a true and correct copy of a document produced during discovery by Wolff bearing Bates Stamps Wolff\_0012493-Wolff\_0012944.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York  
March 3, 2023

  
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CeCe M. Cole